

From: [Howard, Dennis](#)
To: [Eagle, Venus](#)
Cc: jgray@nd.gov; [Clark, Charlie](#); [Dwinell, Steve](#); [Rose Kachadoorian](#); chuck.andrews@cdpr.gov; jxbrough@gw.dec.state.ny.us; [Laws, Meredith](#); [Rate, Debra](#); [Baris, Reuben](#); [Rosenblatt, Daniel](#)
Subject: RE: Existing Stocks for the products instituting the pollinator protection language
Date: Tuesday, September 03, 2013 4:32:46 PM

Dear Venus:

Steve Dwinell asked that I provide a response regarding the timing needed by Florida to process new label statements for the neonicotinoids. The proposed existing stocks provision would prohibit the release for shipment of product with previously-approved labeling after December 30, 2013. One key consideration in this regard is Florida's prolonged growing season. Given our geography and subtropical climate, somewhere in Florida, one crop or another may be found blooming pretty much throughout the year. For example, citrus typically begins blossoming in February (last year it began in January) and the blooming period can last from 6 weeks to more than two months.

Neonicotinoids are of critical importance in controlling the psyllid insect which vectors citrus greening, a disease that has caused unprecedented damage in Florida citrus. Any lapse in the availability of neonicotinoid products could further devastate this beleaguered crop. The uninterrupted availability of neonicotinoids is also important in the production of numerous other Florida crops.

Florida currently has 482 brands of pesticides registered containing at least one of the four neonicotinoid active ingredients addressed by the Agency. It is not clear how many of those brands would be subject to label amendments but we believe that the majority would be. It would require an extra effort for our staff to review several hundred labels for revisions, however, we are willing to work toward expediting the label reviews. One factor that can make our reviews more rapid is that under Chapter 487.041(2)(i), Florida Statutes, whenever label revisions trigger amendment review requirements by EPA, registrants are required to send us a copy of the labeling marked to identify those revisions. We've found that marked up labels for comparison can greatly speed up our reviews. On the other hand, our requirement for marked up labels may slow some registrants in getting their submission to us, compared to submissions in other states where a marked up copy is not necessary.

It would help us if the agency would release new stamped approved labels as they are processed, and if the registrants would send new labels to us as they are accepted by EPA, rather than waiting to submit them to us *en masse*. It would also help us if registrants would prioritize their shipping of amended labels to states that have the earliest growing seasons.

Thanks for seeking our input.

Sincerely,
Dennis Howard

From: Dwinell, Steve
Sent: Thursday, August 29, 2013 12:20 PM

To: Howard, Dennis; Daiker, Dave

Subject: Fwd: Existing Stocks for the products instituting the pollinator protection language

Please see below and let me know what you think.

Sent from my iPhone

Begin forwarded message:

From: "Eagle, Venus" <Eagle.Venus@epa.gov>

Date: August 29, 2013, 12:07:30 PM EDT

To: "jgray@nd.gov" <jgray@nd.gov>, "charlie.clark@freshfromflorida.com" <charlie.clark@freshfromflorida.com>, "steven.dwinell@freshfromflorida.com" <steven.dwinell@freshfromflorida.com>, "rkachadoorian@oda.stat.or.us" <rkachadoorian@oda.stat.or.us>, "Chuck.Andrews@cdpr.ca.gov" <Chuck.Andrews@cdpr.ca.gov>, "jxbrough@gw.dec.state.ny.us" <jxbrough@gw.dec.state.ny.us>

Cc: "Laws, Meredith" <Laws.Meredith@epa.gov>, "Rate, Debra" <Rate.Debra@epa.gov>, "Baris, Reuben" <Baris.Reuben@epa.gov>, "Rosenblatt, Daniel" <Rosenblatt.Dan@epa.gov>

Subject: Existing Stocks for the products instituting the pollinator protection language

Hi All,

RD would appreciate your input on reviewing the attached "draft" amendment letter that lays out the existing stock provision for the products affected by the agency's 8/15/13 letter. RD is planning on reviewing (approx. 350 labels) and stamping off in 3 months or less. Some registrants have indicated concern that the States may not be able or willing to review/accept these amended labels by the time their existing stocks run out. What do you think? The agency was hoping to have these labels in place by the 2014 growing season if possible.

Thanks in advance for your input and any further suggestions.

Best regards,
Venus

Venus Eagle, Product Manager 01
Registration Division (7505P)
Office of Pesticide Programs
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